

County of Los Angeles Department of Human Resources POLICIES, PROCEDURES, AND GUIDELINES

Subject: INJURY AND ILLNESS PREVENTION PROGRAM (IIPP)	Policy Number: 611	Page(s):
	Effective Date: September 15,/2011	
	Approved By:	naganot

POLICY

The Director of Personnel, as delegated to the Chief Executive Officer, administers and provides policy direction for the Countywide environmental health and safety program; however, the head of each department or institution is responsible for developing and implementing an effective environmental health and safety program adapted to the department's or institution's specialized needs. In pursuing this directive, it is the duty of department managers or departmental safety officer/representatives to develop policies and procedures for implementing an effective Injury and Illness Prevention Program.

GUIDELINES

The purpose of this policy is to provide direction and guidance to line departments in developing and maintaining an effective Injury and Illness Prevention Program (IIPP) as required in Title 8, California Code of Regulations (CCR).

An IIPP is a written document that establishes the framework for an occupational health and safety program in accordance with requirements specified in Title 8, CCR, Section 3203, for general industry operations, and Section 1509 for construction industry operations. Every department must have an IIPP that addresses its specific health and safety hazards. The IIPP is instrumental in maintaining a safe and healthful workplace, and in reducing the costs and risks associated with workplace injuries and illness.

Management commitment is necessary to ensure the successful implementation of a comprehensive and effective health and safety program for the department. Managers and supervisors must familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed.

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PROCEDURES

In the event that a Cal/OSHA inspector visits your worksite, he/she will ask to see a copy of your written IIPP. Be prepared to provide this document. You should be familiar with all the components within the document. The inspector may check with employees to determine if they were trained on the IIPP, and are familiar with the program. The IIPP is the core document of your health and safety program and as such is a document that should be continually updated and revised as new operations, equipment, materials, and procedures are introduced into the work environment.

Every department's Injury and Illness Prevention Program must be in writing and at a minimum must include:

- Name(s) of Person or Persons with Authority and Responsibility for Implementing the Program
- A System for Ensuring Employee Compliance with Safe and Healthful Work Practices
- A System of Communication with Employees
- Workplace Hazard Assessment
- Accident/Exposure Investigation
- Hazard Control
- Employee Safety Orientation and Training
- Recordkeeping

Under certain circumstances, the following may also be required:

- Labor/Management Safety and Health Committee
- Code of Safe Practices
- Procedures for Working with Contract Employees

1. Name(s) of Person or Persons with Authority and Responsibility for Implementing the Program

The person or persons with responsibility and authority for the health and safety program must be identified in the IIPP by name or title. If by title, the current individual with the title must be identified by name. These individuals have the responsibility to ensure their department's compliance with the requirements of Section 3203. They must also have the authority to stop hazardous operations and initiate immediate corrective action when necessary.

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2. A System for Ensuring Employee Compliance with Safe and Healthful Work Practices

Management is responsible for developing and implementing safe work practices for all identified hazardous operations. This includes communicating work practices, policies, and procedures to employees and ensuring they are understood. Employees, in turn, are responsible for maintaining a safe work environment by following all established safe work practices, policies, and procedures.

Essential means for ensuring compliance with established safe and healthful work practices include training and retraining programs, recognition of employees who follow proper work practices, and disciplinary action in accordance with Civil Service Rules.

3. A System of Communication with Employees

Open communication between management and employees on health and safety issues is essential to an illness and injury-free, productive workplace. Generally accepted methods of communication include scheduled safety meetings, written safety notifications, newsletters/bulletins, e-mail, anonymous suggestion boxes and safety committees. Regardless of the communication methods used, employees are to be encouraged to report, without fear of reprisal, hazards they identify or suspect at the worksite.

All health and safety issues identified and employee suggestions and/or complaints should be documented, as well as action taken or planned by management.

4. Workplace Hazard Assessment

Scheduled periodic workplace inspections to identify and evaluate unsafe conditions and work practices are an essential part of an IIPP. In addition, inspections must be conducted:

- a. when the Program is first established for new operations;
- whenever new substances, processes, procedures, or equipment are introduced to the workplace that represent a new occupational safety and health hazard; and
- c. whenever management is made aware of new or previously unrecognized hazards.

All inspections should be documented (see Section 8, Recordkeeping).

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5. Accident/Exposure Investigation

Investigations of accidents, exposures or near misses should be conducted with the primary focus of obtaining facts concerning the causes and factors contributing to such incidents. The investigation is aimed at determining how accidents, exposures or near misses can be prevented in the future, not to assign blame. The facts of the incident should be documented on an accident/exposure investigation form.

6. Hazard Control

Procedures must be established for correcting unsafe or unhealthy conditions, work practices and work procedures in a timely manner when first observed or discovered. When corrective action involves multiple steps or cannot be completed promptly, an action plan should be developed. When an imminent hazard exists which cannot be immediately abated without endangering employees and/or property, all exposed personnel must be removed from the area except those necessary to correct the problem.

7. Employee Safety Orientation and Training

Training and instruction on workplace hazards and safe work practices must be provided:

- a. when the IIPP is first established:
- b. to all new employees;
- c. to all employees given new job assignments for which training has not previously been received;
- d. whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- e. whenever management is made aware of a new or previously unrecognized hazard;
- f. to managers and supervisors to familiarize them with the safety and health hazards to which employees under their immediate direction and control may be exposed.

Training in the hazards of the job must be provided to newly hired staff and supervisors, to newly transferred employees and supervisors who have not received the appropriate safety training, and to employees and supervisors when new hazards are introduced into the workplace or previously unrecognized hazards become known. Safety training should be provided prior to placement in high risk occupations and technical assignments whenever possible, or as soon as possible after placement.

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Also, all employees and supervisors should be retrained at a worksite where a work related injury or illness occurs in order to prevent similar incidents from recurring.

8. Recordkeeping

It is important to maintain records of all efforts at administering an injury and illness prevention program. Although Exception No. 4 in Section 3203 exempts local governmental entities such as the County from certain recordkeeping requirements, it is in the department's best interest to maintain records. For example, if an employee, under questioning by a Cal/OSHA inspector, does not remember receiving safety training, documentation of the training may be the only proof of the employee's attendance at the training.

<u>The periodic safety inspections</u> should be documented. Include the names of those conducting the inspection, any unsafe conditions and work practices identified, and the action taken to correct the hazard. These records should be maintained for a minimum of one year.

Any safety training given to employees should be documented, including the names of the attendees, date of training, names and titles of person(s) providing the training, and a short description of the curriculum. These records should also be maintained for a minimum of one year.

<u>Cal/OSHA Form 300:</u> Enter recordable injuries and illness on the Cal/OSHA Form 300, *Log of Work-Related Injuries and Illnesses.* Supplemental information on each recordable injury and illness should be recorded on either Cal/OSHA Form 301, *Injury and Illness Incident Report,* California Form 5020, *Employer's Report of Occupational Injury or Illness,* or similar form. These records must be retained by departments for five years.

9. Labor/Management Safety and Health Committee

Although not required by Section 3203, a department Labor/Management Safety and Health Committee is encouraged by Cal/OSHA and can be used to comply with the communication requirement of Section 3203, provided the Committee:

- a. meets regularly, but not less than quarterly;
- b. makes written records of the issues discussed at the meetings available to employees and Cal/OSHA;
- c. reviews results of the periodic inspections;
- d. reviews investigations of workplace injuries and illness and, where appropriate, submits suggestions to management to prevent future incidents;

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e. reviews investigations of alleged hazardous conditions brought to the attention of the Committee;

- f. participates in the evaluation of employee health and safety suggestions and complaints; and
- g. upon request from Cal/OSHA, verifies abatement action taken to abate Cal/OSHA citations.

10. Code of Safe Practices

The IIPP required by construction-related operations (Section 1509 of the Construction Safety Orders) must have a Code of Safe Practices which clearly establishes safe work rules for particular trades. The majority of County operations must comply with Section 3203 of the General Industry Safety Orders, and therefore do not require a Code of Safe Practices. However, such codes are useful and should be considered for all operations.

11. Working with Contract Employees

When utilizing contract employees for temporary or specialized projects, departments should orient these employees on their IIPP and ensure that they comply with related policies and procedures.

Resources: The CEO Loss Control and Prevention Section (LCP) is available to provide assistance in reviewing your department's IIPP. It can also provide guidance in implementing and maintaining the IIPP. The telephone number for LCP is (213) 738-2269; the fax number is (213) 637-0822.

The California Department of Industrial Relations' Division of Occupational Safety and Health (Cal/OSHA), provides consultation services. Offices for these services are located in Santa Fe Springs and Van Nuys. They can be reached at (800) 963-9424. Cal/OSHA's Internet address is: www.dir.ca.gov.

AUTHORITY

County Administrative Code: Title 5 – Personnel; Chapter 5.31 – Health, Safety Program and Workers' Compensation; Sections 5.31.030 and 5.31.040.

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